# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

# Amoco Oil Company - Lafayette Marketing Terminal 11555 South Indiana 43 Brookston, Indiana 47923

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T181-7040-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

#### **TABLE OF CONTENTS**

Α	SOU	RCE	SUMM	ARY
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- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

#### B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

#### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

#### Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3]

#### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

#### **Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

#### D.1 FACILITY OPERATION CONDITIONS

Three (3) petroleum liquid (gasoline) storage tanks

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]
- D.1.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

#### **Compliance Determination Requirements**

- D.1.3 Testing Requirements [326 2-7-5(1)]
- D.1.4 Volatile Organic Compounds (VOC)
- D.1.5 Hazardous Air Pollutants (HAPs)

#### Record Keeping and Reporting Requirements [326 2-7-5(3)] [326 2-7-16]

- D.1.6 Record Keeping Requirements
- D.1.7 Reporting Requirements

#### D.2 FACILITY OPERATION CONDITIONS

Three (3) distillates storage tanks

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]
- D.2.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

#### **Compliance Determination Requirements**

- D.2.3 Testing Requirements [326 2-7-5(1)]
- D.2.4 Volatile Organic Compounds (VOC)
- D.2.5 Hazardous Air Pollutants (HAPs)

#### Record Keeping and Reporting Requirements [326 2-7-5(3)] [326 2-7-16]

- D.2.6 Record Keeping Requirements
- D.2.7 Reporting Requirements

Page 4 of 42 T181-7040-00008

#### D.3 FACILITY OPERATION CONDITIONS

One (1) tank truck loading rack

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]
- D.3.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

#### **Compliance Determination Requirements**

- D.3.3 Testing Requirements [326 2-7-5(1)]
- D.3.4 Volatile Organic Compounds (VOC)
- D.3.5 Hazardous Air Pollutants (HAPs)

### Record Keeping and Reporting Requirements [326 2-7-5(3)] [326 2-7-16]

- D.3.6 Record Keeping Requirements
- D.3.7 Reporting Requirements

#### D.4 FACILITY OPERATION CONDITIONS

#### One (1) tank truck loading rack

- D.4.1 Volatile Organic Compounds (VOC)
- D.4.2 Volatile Organic Compounds (VOC)

#### **Lafayette Terminal Screening Equation Parameters**

Certification
Emergency/Deviation Occurrence Report
Quarterly Report
Quarterly Compliance Monitoring Report

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana

Permit Reviewer: RAM/EVP

**SECTION A** 

# SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a Bulk Petroleum Storage and Transfer Terminal.

Responsible Official: Dave Cockrum

Source Address: 11555 South Indiana 43, Brookston, Indiana 47923

Mailing Address: P.O. Box 236, Brookston, Indiana 47923

SIC Code: 5171 County Location: White

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD Rules

Minor Source, Section 112 of the Clean Air Act

# A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) 693,109 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as Emission Unit (EU) Tank 1, exhausting at one emission point identified as S2 (constructed in 1953).
- (b) one (1) 693,268 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as EU Tank 2, exhausting at one emission point identified as S3 (constructed in 1953).
- (c) one (1) 742,124 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 3, exhausting at one emission point identified as S4 (constructed in 1966).
- (d) one (1) 1,011,821 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 4, exhausting at one emission point identified as S5 (constructed in 1953).
- (e) one (1) 1,377,553 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 5, exhausting at one emission point identified as S6 (constructed in 1953).
- (f) one (1) 1,510,688 gallon nominal capacity petroleum products storage tank internal floating roof identified as EU Tank 6, exhausting at one emission point identified as S7 (constructed in 1970).
- (g) one (1) tank truck loading rack with two loading bays capable of bottom loading petroleum products, which include gasoline and distillates, identified as EU Rack, exhausting through one (1) stack identified as F3 (constructed prior to January 1, 1980).

# A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

Page 7 of 42 T181-7040-00008

#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

#### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

#### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

#### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

#### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

#### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

#### B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
  - (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

#### B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

#### B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

#### B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

# B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

#### Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] B.19

- The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 (a) whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- The Permittee may implement administrative amendment changes addressed in the (c) request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
  - No Part 70 permit revision shall be required under any approved economic incentives, (a) marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

#### B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

#### B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

# B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

#### B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

# SECTION C

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4
  and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
  mandatory for any removal or disturbance of RACM greater than three (3) linear feet on
  pipes or three (3) square feet on any other facility components or a total of at least 0.75
  cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

#### C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

#### C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of

reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this
  permit, the Permittee shall take appropriate corrective actions. The Permittee shall
  submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of
  receipt of the test results. The Permittee shall take appropriate action to minimize
  emissions from the affected facility while the corrective actions are being implemented.
  IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions
  taken are deficient. The Permittee shall submit a description of additional corrective
  actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.
  IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant
  stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120)

days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
    - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
    - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
  - (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
  - (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
  - (b) As an alternative to the observations, sampling, maintenance procedures, and record

keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana Permit Reviewer: RAM/EVP

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C Compliance Monitoring Plan Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
  - Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Stratospheric Ozone Protection**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) 693,109 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as Emission Unit (EU) Tank 1, exhausting at one emission point identified as S2 (constructed in 1953).
- (b) one (1) 693,268 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as EU Tank 2, exhausting at one emission point identified as S3 (constructed in 1953).
- (f) one (1) 1,510,688 gallon nominal capacity petroleum products storage tank internal floating roof identified as EU Tank 6, exhausting at one emission point identified as S7 (constructed in 1970).

#### Emission Limitations and Standards [326 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]

The sum of the nominal throughput capacity of petroleum products (gasoline) through all three storage tanks based on existing physical limitations is 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42.

Compliance with these parameters and Conditions D.2 and D.3 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

#### **Compliance Determination Requirements**

#### D.1.3 Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC (throughput) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.4 Volatile Organic Compounds (VOC)

Compliance with the parameters contained in Condition D.1.1 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. IDEM, OAM, reserves the authority to determine compliance using other Methods acceptable to the department.

#### D.1.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.1.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

#### Record Keeping and Reporting Requirements [326 2-7-5(3)]

#### D.1.6 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the parameters established in Condition D.1.1 and D.1.2.
  - (1) The throughput of petroleum products (gasoline) loaded through the loading rack as specified in Condition D.3.6;
  - (2) the types of volatile petroleum liquid stored (gasoline or distillate) in each tank; and
  - (3) the total number of tanks storing gasoline in each month.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements [40 CFR 3.428(i)]

- (a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.1.2 the parameter shall be the number of internal floating roof tanks in gasoline service.
- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
- (c) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

#### SECTION D.2

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

- one (1) 742,124 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 3, exhausting at one emission point identified as S4 (constructed in 1966).
- (d) one (1) 1,011,821 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 4, exhausting at one emission point identified as S5 (constructed in 1953).
- (e) one (1) 1,377,553 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 5, exhausting at one emission point identified as S6 (constructed in 1953).

#### Emission Limitations and Standards [326 2-7-5(1)]

### D.2.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]

The sum of the nominal throughput capacity of distillates through all three storage tanks based on existing physical limitations is 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

#### D.2.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42. At this maximum capacity, the HAP emissions from the three tanks and other non-gasoline management sources (defined as OE in the screening equation) are estimated to be less than the maximum value of 1.25 tons per year.

Compliance with these parameters and Conditions D.1 and D.3 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

#### **Compliance Determination Requirements**

#### D.2.3 Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC (throughput) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 Volatile Organic Compounds (VOC)

Compliance with the parameters contained in Condition D.2.1 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. IDEM, OAM, reserves the authority to determine compliance using other Methods acceptable to the department.

#### D.2.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.2.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

#### Record Keeping and Reporting Requirements [326 2-7-5(3)]

#### D.2.6 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance with the parameters established in Condition D.2.1 and D.2.2.
  - (1) the types of volatile petroleum liquid stored (gasoline or distillate) in each tank; and
  - (2) Upon request by IDEM, records that demonstrate that the HAP emissions from these tanks and other non-gasoline management activities have and OE value of less than 1.25 tons per year.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.2.7 Reporting Requirements [40 CFR 3.428(i)]

- (a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.2.2 the permittee shall certify that the OE has a value of less than 1.25 tons per year.
- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
- (c) Upon request by IDEM, the permittee shall submit a summary of the information to document compliance with Condition D.2.2 to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent.

## SECTION D.3

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

(g) one (1) tank truck loading rack with two loading bays capable of bottom loading petroleum products, which include gasoline and distillates, identified as EU Rack, exhausting through one (1) stack identified as F3 (constructed prior to January 1, 1980).

#### Emission Limitations and Standards [326 2-7-5(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 2-7-5(1)]

The sum of the nominal loading capacity of petroleum products (which include gasoline and distillates) through the truck loading rack based on existing physical limitations is 473,040,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

#### D.3.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

- (a) The loading of petroleum products (gasoline) through the truck loading rack is limited to 123,262,000 gallons of gasoline per twelve (12) consecutive month period, rolled on a monthly basis.
- (b) The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42.
- (c) At the maximum capacity of distillate loading stated in D.3.1, the HAP emissions from the loading rack and other non-gasoline management sources (defined as OE in the screening equation) are estimated to be less than the maximum value of 1.25 tons per year.
- (d) Compliance with these parameters and Conditions D.1 and D.2 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

#### **Compliance Determination Requirements**

### D.3.3 Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAP parameters specified in Conditions D.1.1, D.1.2, D.2.1, D.2.2, D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.4 Volatile Organic Compounds (VOC)

Compliance with the parameters contained in Condition D.3.2 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. IDEM, OAM, reserves the authority to determine compliance using other Methods acceptable to the department.

#### D.3.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.3.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

#### Record Keeping and Reporting Requirements [326 2-7-5(3)]

#### D.3.6 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Condition D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the parameters established in Condition D.3.1 and D.3.2.
  - (1) The amount of gasoline loaded for each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred;
  - (2) The amount of distillates loaded for each month;
  - (3) A log of the dates for loading each product; and
  - (4) The types of volatile petroleum liquids loaded (gasoline or distillate).
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.3.7 Reporting Requirements [40 CFR 3.428(i)]

- (a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.3.2 the parameter shall be the amount of gasoline loaded.
- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
- (c) A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the guarter being reported.

### SECTION D.4

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.4.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana

Permit Reviewer: RAM/EVP

## PART 70 OPERATING PERMIT **Lafayette Terminal Screening Equation Parameters**

Source Name: Amoco Oil Company - Lafayette Marketing Terminal Source Address: 11555 South Indiana 43, Brookston, Indiana 47923

Part 70 Permit No.: P.O. Box 236, Brookston, Indiana 47923

T181-7040-00008

These parameters are those that were current at the time of permit issue. If facility receives approval on a new parameter values, then the facility shall comply with the most recently approved parameter values. The facility is required to maintain a copy of the current parameter values on site.

Changes to parameter values are allowed without a permit modification if such changes do not result in changes to the physical lay out of the facility (e.g., construction of new tanks or physical modification of the loading rack) or increase the VOC potential to emit for the facility.

The terminal handles non-reformulated and non-oxygenated gasoline: CF = 0.16

Sources of OE emissions include distillate and interface management at tanks and racks, remediation, barge loading of gasoline, and other minor miscellaneous sources.

Under 40 CFR 63 Subpart R, the facility is required to not exceed any of the following parameters on a 30 day rolling basis.

#### **Number of Gasoline Storage Tanks and components**

Fixed Roof (TF)	Internal Floating Roof (TI)	External Floating Roof (Primary seals only) (TE)	External Floating Roof (Primary and secondary seals) (TES)	Total Fugitive Components (C)
0	3	0	0	1000

#### **Screening Equation**

ET = CF\*(0.59\*TF(1-CE) + 0.038\*TI + 0.17\*TE + 0.08\*TES + 8.5\*10-6\*C + 4.52\*10-6\*Q) + 0.04\*0E

Maximum gasoline loading rack throughput allowed on a 30 day rolling basis:

123.26 MM gallons per year

337,704 gallons per day or 1,278,208 liters per day

With these parameter values, and a maximum value of OE of 1.25 tons per year of HAPS from nongasoline management sources (i.e., distillate management), the facility value of Et will be less than 1.0.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Page 38 of 42 T181-7040-00008

## OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Amoco Oil Company - Lafayette Marketing Terminal Source Address: 11555 South Indiana 43, Brookston, Indiana 47923

Mailing Address: P.O. Box 236, Brookston, Indiana 47923

Part 70 Permit No.: T181-7040-00008
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

Page 39 of 42 T181-7040-00008

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674

Fax: 317-233-5967

## PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Amoco Oil Company - Lafayette Marketing Terminal Source Address: 11555 South Indiana 43, Brookston, Indiana 47923

Mailing Address: P.O. Box 236, Brookston, Indiana 47923

Part 70 Permit No.: T181-7040-00008

This for	m consists of 2 pages	Page 1 of 2
Check	either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)  C The Permittee must notify the Office of Air Management (business hours (1-800-451-6027 or 317-233-5674, ask for The Permittee must submit notice in writing or by facsimil (Facsimile Number: 317-233-5967), and follow the other 7-16	or Compliance Section); and le within two (2) days
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  The Permittee must submit notice in writing within ten (10)	)) calendar davs

## If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:	
Control Equipment:	
Permit Condition or Operation Limitation in Permit:	
Description of the Emergency/Deviation:	
Describe the cause of the Emergency/Deviation:	

Page 40 of 42 T181-7040-00008

Page 2 of 2 If any of the following are not applicable, mark N/A Date/Time Emergency/Deviation started: Date/Time Emergency/Deviation was corrected: Was the facility being properly operated at the time of the emergency/deviation? Y Ν Describe: Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>x</sub>, CO, Pb, other: Estimated amount of pollutant(s) emitted during emergency/deviation: Describe the steps taken to mitigate the problem: Describe the corrective actions/response steps taken: Describe the measures taken to minimize emissions: If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: Form Completed by: Title / Position: Date: Phone:

## OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## **PART 70 OPERATING PERMIT Quarterly Report**

Source Name:	Amoco Oil Company - Lafayette Marketing Terminal
Source Address:	11555 South Indiana 43, Brookston, Indiana 47923
Mailing Address.	D.O. Day 226 Dreakaton Indiana 47022

Mailing Address: P.O. Box 236, Brookston, Indiana 47923

Part 70 Permit No.: T181-7040-00008

Facility: Three Petroleum Products (Gasoline) Storage Tanks, Three Distillates Storage

Tanks and Petroleum Products Loading

Parameter: Screening Equation Parameters

Limit: 123,262,000 gallons of gasoline per 12-month period rolled on a monthly basis.

Generator S/V ID: \_\_\_\_\_ Month: \_\_\_\_ Year: \_\_\_\_

	Maximum Parameter Value - Only in Gasoline Service							
Month	No. of Fixed Roof Tanks		No. of Ext. Floating Roof Tanks (Primary Seals Only)	No. of Ext. Floating Roof Tanks (Primary and Secondary Seals)	Fugitive	Rack Gasoline Throughput for Month (Gallons per Day)		
Current Screening Equation Parameter Limit								

9		occurred in this quarter. as been reported on:	
Title	mitted by: / Position: ature:		
Date	e:		

9 No deviation occurred in this quarter.

Page 42 of 42 T181-7040-00008

Permit Reviewer: RAM/EVP

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Source Address: Mailing Address: Part 70 Permit No.:	11555 South P.O. Box 236	Indiana 43, B 6, Brookston, I	ayette Marketing Terminal rookston, Indiana 47923 ndiana 47923	
ľ	Months:	to	Year:	
stated in this pern monitoring require be attached if neo	nit. This report ements and the essary. This fo ort. If no deviati	shall be subnoted date(s) of eaperm can be su	s met all the compliance m nitted quarterly. Any deviat ch deviation must be report pplemented by attaching th please specify in the box r	ion from the compliance red. Additional pages may be Emergency/Deviation
9 NO DEVIATION	IS OCCURRED	THIS REPO	RTING PERIOD	
9 THE FOLLOWI	NG DEVIATION	NS OCCURR	ED THIS REPORTING PER	RIOD.
Compliance M (e.g. Pern	lonitoring Req nit Condition D.		Number of Deviations	Date of each Deviation
Titl Da	rm Completed l le/Position: te: one:	By:		

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

## **Source Background and Description**

Source Name: Amoco Oil Company - Lafayette Marketing Terminal Source Location: 11555 South Indiana 43, Brookston, Indiana 47923

County: White SIC Code: 5171

Operation Permit No.: F181-7040-00008

Permit Reviewer: Richard A. Moore Jr./EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Amoco Oil Company - Lafayette Terminal relating to the operation of a Bulk Petroleum Storage and Transfer Terminal.

## **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) 693,109 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as Emission Unit (EU) Tank 1, exhausting at one emission point identified as S2 (constructed in 1953).
- one (1) 693,268 gallon nominal capacity petroleum products storage tank external floating roof with Dome Roof, identified as EU Tank 2, exhausting at one emission point identified as S3 (constructed in 1953).
- one (1) 742,124 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 3, exhausting at one emission point identified as S4 (constructed in 1966).
- one (1) 1,011,821 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 4, exhausting at one emission point identified as S5 (constructed in 1953).
- (5) one (1) 1,377,553 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 5, exhausting at one emission point identified as S6 (constructed in 1953).
- (6) one (1) 1,510,688 gallon nominal capacity petroleum products storage tank internal floating roof identified as EU Tank 6, exhausting at one emission point identified as S7 (constructed in 1970).
- (7) one (1) 10,000 gallon nominal capacity distillates storage tank coned roof identified as EU Tank 7, exhausting at one emission point identified as S8.
- (8) one (1) tank truck loading rack with two loading bays capable of bottom loading petroleum products, which include gasoline and distillates, identified as EU Rack, exhausting through one (1) stack identified as F3 (constructed prior to August 7, 1977).

#### Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

#### New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

## **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (4) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (5) Combustion source flame safety purging on startup.
- (6) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (7) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (8) The following VOC and HAP storage containers:
  - A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (9) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Groundwater oil recovery wells.
- (14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

- (15) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (16) Process vessel degassing and cleaning to prepare for internal repairs.
- (17) Paved and unpaved roads and parking lots with public access.
- (18) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (19) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (20) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (21) On-site fire and emergency response training approved by the department.
- (22) Filter or coalescer media changeout.

## **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

(1) 91-09-87-0080, issued on November 22, 1983.

All conditions from previous approvals were incorporated into this Part 70 permit.

#### **Enforcement Issue**

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 26, 1996. Additional information was received on August 28, 1998, August 31, 1998 and September 9, 1998.

A notice of completeness letter was mailed to the source on November 12, 1996.

#### **Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (pages 1 through 5.)

#### **Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)			
PM	less than 100			
PM-10	less than 100			
SO <sub>2</sub>	less than 100			
VOC	greater than 250			
СО	less than 100			
NO <sub>x</sub>	less than 100			

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)			
Benzene	less than 10			
n-Hexane	less than 10			
Toluene	less than 10			
Ethylbenzene	less than 10			
Xylenes	less than 10			
Isopropylbenzene	less than 10			
Isooctane	less than 10			
Naphthalene	less than 10			
MTBE	greater than 10			
TOTAL	greater than 25			

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
  Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability.

#### **Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1995 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	
PM-10	1.71
SO <sub>2</sub>	
VOC	125.6
СО	
NO <sub>x</sub>	
Benzene	0.2
n-Hexane	0.27
Toluene	0.89
Ethylbenzene	0.02
Xylenes	0.34
Isopropylbenzene	0.01
Isooctane	0.75
Naphthalene	0.01
MTBE	3.43
Total HAPs	5.93

#### **Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The loading rack has a limitation of 80,000,000 gallons of gasoline per year with an average Reid Vapor Pressure (RVP) of 10 pounds per square inch (psi) (to limit any single HAP to less than 10 tons per year and any combination of HAPs to less than 25 tons per year) as a result of 40 CFR 63 Subpart R.

		Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	СО	NO <sub>x</sub>	Single HAP	Total HAPs
Truck Loading Gasoline	_		_	561.15		_	_	_
Truck Loading Distillates				3.88			_	_
Storage Tanks				10.5		_	_	_
Fugitives		1.71		0.16			_	-
Insignificant				5			_	_
Total Emissions		1.71		580.69	_		<10*	<25*

<sup>\*</sup> Pursuant to 326 IAC 20, (40 CFR Part 63.420, Subpart R), a source that has documented through the submission of the screening equation showing a value of ET<1, that it is not a major source for HAPs as defined at Section 63.2 of this part has a potential to emit of any single HAP below 10 tons per year and the total PTE of all HAPs are below 25 tons per year.

## **County Attainment Status**

The source is located in White County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
СО	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen ( $NO_x$ ) are precursors for the formation of ozone. Therefore, VOC and  $NO_x$  emissions are considered when evaluating the rule applicability relating to the ozone standards. White County has been designated as attainment or unclassifiable for ozone.

#### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Federal Rule Applicability**

326 IAC 12, (40 CFR Part 60.110, Subpart K; 40 CFR Part 60.110a, Subpart Ka; and 40 CFR Part 60.110b, Subpart Kb-Standards of Performance for Storage Vessels)

The existing seven (7) permitted storage tanks (identified as S2, S3, S4, S5, S6, S7 and S8) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K, 60.110a, Subpart Ka, and 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" because all the listed tanks were constructed before June 11, 1973. Therefore the provisions of this Subpart do not apply.

326 IAC 12, (40 CFR Part 60.500, Subpart XX, Standards of Performance for Bulk Gasoline Terminals)

The existing loading rack identified as EU Rack is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because the loading rack was constructed or modified before December 17, 1980. Therefore the provisions of this Subpart do not apply.

326 IAC 20, (40 CFR Part 63.460, Subpart T, National Emission Standards for Halogenated Solvent Cleaning)

The degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.460, Subpart T). The solvent used in the degreasing operations are not halogenated solvents. Therefore the provisions of this Subpart do not apply.

#### Pipeline Breakout Stations)

This source is subject to the requirements for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.420, Subpart R). However, because the source has documented and recorded (through the submission of the screening equation showing a value of ET<1) that it is not a major source for HAPs as defined at Section 63.2 of this part (i.e., potential to emit of any single HAP is below 10 tons per year and the total of all HAPs are below 25 tons per year) they are only subject to recordkeeping and reporting conditions.

#### State Rule Applicability - Entire Source

## 326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a major source under 326 IAC 2-2 (PSD) but has not been through PSD review. This rule applies to sources commencing construction after August 7, 1977. This source was constructed prior to the applicability date. The storage tanks and the truck loading rack were all constructed prior to the applicability date. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

## 326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not be visible crossing property lines.

#### State Rule Applicability - Individual Facilities

### 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

The source is not subject to the requirements of 326 IAC 6-1-2, because the source is not located in the listed counties.

#### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1.1 because none of the facilities have the PTE SO<sub>2</sub> more than 25 tons per year or 10 lbs per hour. Therefore, pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 and 7.2 do not apply.

## 326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

Page 8 of 12 T181-7040-00008

Permit Reviewer: RAM/EVP

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1, the source is not subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) for the existing three (3) permitted storage tanks (S2, S3 and S7) because they were constructed prior to 1980, even though the listed tanks contain petroleum liquids and have capacities greater than one hundred fifty thousand (150,000) liters [thirty-nine thousand (39,000) gallons].

The existing three (3) permitted storage tanks (S4, S5 and S6) are not subject to the requirements of this rule. While the listed tanks contain petroleum liquids and have capacities greater than one hundred fifty thousand (150,000) liters [thirty-nine thousand (39,000) gallons], they each store volatile organic compounds with a true vapor pressure (TVP) less than 10.5 kPa (1.52 psi). Therefore, pursuant to 326 IAC 8-4-3, the requirements of this rule do not apply to tanks S4, S5 and S6 (Tanks 3, 4 and 5).

The existing permitted storage tank (S8) is not subject to the requirements of this rule because the listed tank does not have a capacity greater than one hundred fifty thousand (150,000) liters [thirty-nine thousand (39,000) gallons]. Therefore, pursuant to 326 IAC 8-4-3, the requirements of this rule do not apply to tank S8 (Tank7).

## 326 IAC 8-4-4 (Bulk Gasoline Terminals)

This source is not subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals), because although this source fits the definition of a bulk gasoline terminal under 326 IAC 1-2-8, (having a 326 IAC 20, 40 CFR Part 63.420, Subpart R, limited daily gasoline throughput of approximately 258.9 million gallons per day) this source is not located in one of the listed counties and was constructed prior to January 1, 1980.

#### 326 IAC 8-4-5 (Bulk Gasoline Plants)

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants), because the source is not a bulk gasoline plant as defined in 326 IAC 1-2-7.

#### 326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable containers and is not a gasoline dispensing facility.

Page 10 of 12 T181-7040-00008

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana

Permit Reviewer: RAM/EVP

#### 326 IAC 8-4-7 (Gasoline Transports)

The source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports), because it is not an owner or operator of a gasoline transport.

## 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 through 326 IAC 8-4-6 and 326 IAC 8-4-7 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems, Records). Since this source is not subject to the requirements of 326 IAC 8-4-4 through 326 IAC 8-4-6 or 326 IAC 8-4-7, the requirements of this rule do not apply.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source commenced operation prior to October 7, 1974, therefore, this rule does not apply.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- 1. Storage tanks EU Tank 1, EU Tank 2, EU Tank 6, and EU Tank 7 have applicable compliance monitoring conditions as specified below:
  - a) The sum of the throughputs of petroleum products (gasoline) through all three storage Tanks (EU 1, 2, and 6) is limited to 250,000,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. The sum of the throughputs of petroleum products (gasoline) through Tank 7 is limited to 50,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. These limits are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each tank per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.

c) Records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of inspections performed on the storage vessels shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limit on the total tank throughput for these storage tanks is needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

- 2. Storage tanks EU Tank 3, EU Tank 4, and EU Tank 5 have applicable compliance monitoring conditions as specified below:
  - a) The sum of the throughputs of distillates products through all three storage Tanks is limited to 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. These limits are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each tank per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.
  - c) Records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of inspections performed on the storage vessels shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limit on the total tank throughput for these storage tanks is needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

- 3. The operation of the tank truck loading rack has applicable compliance monitoring conditions as specified below:
  - a) The loading of petroleum products (gasoline and distillates) through the truck loading rack is limited to 123,262,000 gallons of gasoline and 473,040,000 gallons of distillates per twelve (12) consecutive month period, rolled on a monthly basis. These limits are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each petroleum product (gasoline and distillates) per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.

c) Records of the types of volatile petroleum liquid loaded, the maximum true vapor pressure of the liquid as loaded, and the results of inspections performed on the vapor collection and control system shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limits on the tank truck loading rack are needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

#### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

#### Conclusion

The operation of this Bulk Petroleum Storage and Transfer Terminal. shall be subject to the conditions of the attached proposed Part 70 Permit No. T181-7040-00008.

## Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Amoco Oil Company - Lafayette Marketing Terminal Source Location: 11555 South Indiana 43, Brookston, Indiana 47923

County: White SIC Code: 5171

**Operation Permit No.:** T181-7040-00008

Permit Reviewer: Richard A. Moore Jr./EVP

On April 1, 1999, the Office of Air Management (OAM) had a notice published in the Herald Journal, Monticello, Indiana, stating that Amoco Oil Company - Lafayette Terminal had applied for a Part 70 Operating Permit to operate a Bulk Petroleum Storage and Transfer Terminal. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 18, 1999, Amoco Oil Company - Lafayette Terminal (a.k.a., BP Amoco) submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

#### Comment #1

The applicant has requested that references to 326 IAC 2-7-4 relating to permit content issues be changed to correctly reference 326 IAC 2-7-5.

#### Response #1

These technical corrections have been made and are reflected on the following pages: Page 3 of 42 Table of Contents sections D.1, D.2 and D.3; Page 4 of 42 section D.4 (which is now relabeled as D.3); Page 29 of 42 Facility Operation Conditions Section D.1; Page 31 of 42 Section D.2; Page 33 of 42 Section D.4 (which is now relabeled as D.3); and Page 35of 42 Section D.5 (which is now relabeled as D.4).

#### Comment #2

The applicant has requested OAM to "delete Section D.3 on EU Tank 7. Tank 7 is a dedicated emergency response vessel used only to collect any release from the pipeline pressure relief valve. It is not a routine storage tank and should not be listed in the permit in Section D. Instead, it should be listed as an insignificant activity. Emissions (VOC) from Tank 7 are less that 1 ton per year."

#### Response #2

The OAM has made revisions to the permit in Condition A.2 (g) and (h) (Emission Units and Pollution Control Equipment Summary), on page 5 and 6 of 42 of the Part 70 Permit, which are as follows: the previously labeled (g) emission unit (EU Tank 7) has been removed from A.2 and the previously labeled (h) emission unit (EU Rack) was relabeled as (g). Based on this change previously labeled Section D.3 (Facility Description), on page 33 of 46 is not required and has been removed with the renumbering of Sections D.4 and D.5 which are now numbered as D.3 and D.4, respectively.

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The correct statements in the TSD would be as follows (additions indicated in **boldface**, deletions indicated by strikeout for emphasis):

Permitted Emission Units and Pollution Control Equipment

- (7) one (1) 10,000 gallon nominal capacity distillates storage tank coned roof identified as EU

  Tank 7, exhausting at one emission point identified as S8.
- (8)(7) one (1) tank truck loading rack with two loading bays capable of bottom loading petroleum products, which include gasoline and distillates, identified as EU Rack, exhausting through one (1) stack identified as F3 (constructed prior to August 7, 1977).

## **Insignificant Activities**

(19) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

one (1) 10,000 gallon nominal capacity emergency catch tank, coned roof, identified as EU Tank 7, exhausting at one emission point identified as S8 with less than 1 ton per year emissions of VOCs.

## Federal Rule Applicability

326 IAC 12, (40 CFR Part 60.110, Subpart K; 40 CFR Part 60.110a, Subpart Ka; and 40 CFR Part 60.110b, Subpart Kb-Standards of Performance for Storage Vessels)

The existing seven (7) six (6) permitted storage tanks (identified as S2, S3, S4, S5, S6, and S7 and S8) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart K, 60.110a, Subpart Ka, and 60.110b, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" because all the listed tanks were constructed before June 11, 1973. Therefore the provisions of this Subpart do not apply.

State Rule Applicability - Individual Facilities

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The existing permitted storage catch tank (S8) is not subject to the requirements of this rule because the listed tank does not have a capacity greater than one hundred fifty thousand (150,000) liters [thirty-nine thousand (39,000) gallons] and the tank is used for emergency pressure relief and not as a storage tank. Therefore, pursuant to 326 IAC 8-4-3, the requirements of this rule do not apply to tank S8 (Tank7).

#### Compliance Requirements

- 1. Storage tanks EU Tank 1, EU Tank 2, **and** EU Tank 6, <del>and EU Tank 7</del> have applicable compliance monitoring conditions as specified below:
  - a) The sum of the **nominal** throughputs **capacity** of petroleum products (gasoline) through all three storage Tanks (EU 1, 2, and 6) **based on existing physical limitations** is <del>limited to 250,000,000</del> **905,940,000** gallons per twelve (12) consecutive month period, rolled on a monthly basis. The sum of the throughputs of petroleum products (gasoline) through Tank 7 is limited to 50,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. These limits are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the **number of tanks in gasoline service** <del>gallons of throughput for each tank</del> per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.
  - c) Records of the types of volatile petroleum liquid stored, the number of tanks in gasoline service, and the gallons of gasoline loaded through the loading rack the maximum true vapor pressure of the liquid as stored, and the results of inspections performed on the storage vessels shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limit on the total tank throughput for these storage tanks is needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

#### Comment #3

The applicant has requested OAM to "eliminate unnecessary throughput and VOC limitations on the floating roof storage tanks, distillate storage tanks, and the loading rack. Replace these with statements listing their physical capacity and their potential to emit, thus accomplishing the need to document the values without creating unnecessary permit limits."

The applicant has also requested OAM to "add separate sections for HAPs reflecting the requirements of the screening equation for the regulated sources." and to

"Replace the unnecessary MRR requirements to those required for the screening equation and those necessary to show that if the facility ever does operate at levels close to its potential throughput, that records be available for IDEM upon request to demonstrate that the facility has not changed." and to also "Correct errors in the permit misstating the nominal loading rack and floating roof storage tank throughput values."

## Response #3

These requests all affect the same Conditions and are therefore combined in a common response.

There are no source wide limits on VOC emissions based on the grandfathered status of all the facilities located at the source. Also, the applicant has chosen not to limit HAP emissions by limiting VOC emissions. Instead, the applicant has met the conditions to be defined as an area source pursuant to 326 IAC 20, (40 CFR Part 63.420, Subpart R). By making the requested changes the HAP emissions do not increase and the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the OAM has made revisions to the permit in Section D.1, D.2, and D.3 (previously labeled D.4), which are as follows (additions indicated in **boldface**, deletions indicated by strikeout for emphasis):

## Volatile Organic Compounds (VOC) [326 2-7-4(1)][326 2-7-5(1)]

The sum of the **nominal** throughputs **capacity** of petroleum products (gasoline) through all three storage tanks based on existing physical limitations is limited to 250,000,000 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

## D.1.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

The above throughput limits and the throughput limits of The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42.

Compliance with these parameters and Conditions D.2 and D.4 D.3 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Compliance Determination Requirements

## D.1.23 Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAP parameters specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## <u>D.1.34 Volatile Organic Compounds (VOC)</u>

Compliance with the parameters usage limitations contained in Condition D.1.1 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. 326 <del>IAC 8-4-3(a).</del> IDEM, OAM, reserves the authority to determine compliance using **other** Methods acceptable to the department. 18, 25, or 25A in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.1.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

Record Keeping and Reporting Requirements [326 2-7-5(3)]

## D.1.46 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) (3) below. Records maintained for (1) through (6) (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits parameters established in Conditions D.1.1 and D.1.2.
  - (1) The throughput of petroleum products (gasoline) loaded through the loading rack as specified in Condition D.3.6; each tank for each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred:
  - (2) The total throughputs of petroleum products (gasoline) through all three tanks per month:
- (3) The 12 month rolling total throughputs of petroleum products (gasoline and/or distillates) through all three tanks;
- - (3) the total number of tanks storing gasoline in each month.
- (5) the maximum true vapor pressure of the liquid as stored; and
  - (6) the results of inspections performed on the storage vessels.
  - (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

#### D.1.7 Reporting Requirements [40 CFR 3.428(i)]

(a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.1.2 the parameter shall be the number of internal floating roof tanks in gasoline service.

- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
- (c) A quarterly summary of the information to document compliance with Condition D.1.1 D.1.2 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the guarter being reported.

## D.2.1 Volatile Organic Compounds (VOC) [326 2-7-4(1)][326 2-7-5(1)]

(a) The sum of the **nominal** throughputs capacity of distillates through all three storage tanks based on existing physical limitations is limited to 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

## D.2.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

(b) The above throughput limits and the throughput limits of The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42. At this maximum capacity, the HAP emissions from the three tanks and other nongasoline management sources (defined as OE in the screening equation) are estimated to be less than the maximum value of 1.25 tons per year.

Compliance with these parameters and Conditions D.1 and D.4 D.3 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Compliance Determination Requirements

## D.2.23 Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAP parameters specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## D.2.34 Volatile Organic Compounds (VOC)

Compliance with the parameters usage limitations contained in Condition D.2.1 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. 326 IAC 8-4-3(a). IDEM, OAM, reserves the authority to determine compliance using other Methods acceptable to the department. 18, 25, or 25A in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.2.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

Record Keeping and Reporting Requirements [326 2-7-5(3)]

## D.2.46 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) (2) below. Records maintained for (1) through (6) and (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits parameters established in Condition D.2.1 and D.2.2.
  - (1) The throughput of distillates through each tank for each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred:
- (2) The total throughputs of distillates through all three tanks per month;
  - (3) The 12 month rolling total throughputs of distillates through all three tanks;
- the types of volatile petroleum liquid stored (gasoline or distillate) in each tank; and
  - (2) Upon request by IDEM, records that demonstrate that the HAP emissions from these tanks and other non-gasoline management activities have an OE value of less than 1.25 tons per year.
  - (5) the maximum true vapor pressure of the liquid as stored; and
    - (6) the results of inspections performed on the storage vessels.
      - (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

## D.2.5 Reporting Requirements

## D.2.7 Reporting Requirements [40 CFR 3.428(i)]

- (a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.2.2 the permittee shall certify that the OE has a value of less than 1.25 tons per year.
- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.

(c) A quarterly Upon request by IDEM, the permittee shall submit a summary of the information to document compliance with Condition D.2.1 D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent. , within thirty (30) days after the end of the quarter being reported.

## **D.**43.1 Volatile Organic Compounds (VOC) [326 2-7-4(1)][326 2-7-5(1)]

The sum of the nominal loading capacity of petroleum products (which include gasoline and distillates) through the truck loading rack based on existing physical limitations is 473,040,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

## D.3.2 Hazardous Air Pollutants (HAPs) [326 2-7-5(1)]

- (a) The loading of petroleum products (gasoline) through the truck loading rack is limited to 157,345,440 123,262,000 gallons of gasoline per twelve (12) consecutive month period, rolled on a monthly basis.
- (b) The loading of distillates through the truck loading rack is limited to 157,345,440 gallons of distillates per twelve (12) month period, rolled on a monthly basis. The permittee shall maintain the area source status for HAP emissions by compliance with the parameters submitted for the screening equation found in 40 CFR 63.420(1) [326 IAC 20]. The parameters submitted as part of this permit are attached to the end of Section D on page 37 of 42.
- (c) At the maximum capacity of distillate loading stated in D.3.1, the HAP emissions from the loading rack and other non-gasoline management sources (defined as OE in the screening equation) are estimated to be less than the maximum value of 1.25 tons per year.
- (d) The above throughput limits and the throughput limits of Compliance with these parameters and Conditions D.1 and D.2 shall define the source as an area source, and shall limit the total potential to emit of any single HAP and total HAP emissions such that the source wide emissions of a worst case single HAP and total HAPs are limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. Therefore, the additional requirements of 40 CFR Part 63.420, Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

**Compliance Determination Requirements** 

## D.4.2**D.3.3** Testing Requirements [326 2-7-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC (throughput) limit and HAP parameters specified in Conditions D.1.1, D.1.2, D.2.1, D.2.2, D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.4.3D.3.4 Volatile Organic Compounds (VOC)

Compliance with the parameters usage limitations contained in Condition D.1.1 D.3.2 shall be determined pursuant to the recordkeeping and reporting requirements of Conditions D.3.6 and D.3.7. 326 IAC 8-4-3(a). IDEM, OAM, reserves the authority to determine compliance using other Methods acceptable to the department. 18, 25, or 25A in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

## D.3.5 Hazardous Air Pollutants (HAPs)

Compliance with the limitations contained in Condition D.3.2 shall be determined pursuant to the requirements of 40 CFR 63.428(i)(2). The source shall maintain records to document that the parameters established under 40 CFR 63.420(c) have not been exceeded during any thirty (30) consecutive day period, rolled on a daily basis.

Record Keeping and Reporting Requirements [326 2-7-5(3)]

## D.4.4D.3.6 Record Keeping Requirements [40 CFR 63.428(i)]

- (a) To document compliance with Conditions D.4.1 D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (6) (4) below. Records maintained for (1) through (6) (4) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits parameters established in Condition D.4.1 D.3.1 and D.3.2.
  - (1) The amount of gasoline loaded for each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred;
  - (2) The amount of distillates loaded for each month;
  - (3) A log of the dates for loading each product; and
  - (4) The types of volatile petroleum liquids loaded (gasoline or distillate).
- (5) The maximum true vapor pressure of the petroleum liquids as loaded; and
  - (6) the results of inspections performed and any repairs made on the truck loading rack, vapor collection system and carbon adsorption vapor recovery unit.
  - (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.4.5 Reporting Requirements

### D.3.7 Reporting Requirements [40 CFR 3.428(i)]

- (a) The permittee shall report annually to the Administrator that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. To document compliance with Condition D.3.2 the parameter shall be the amount of gasoline loaded.
- (b) Prior to any of the parameters being exceeded, the permittee shall submit a request for modification of any parameter to the Administrator for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.
- (c) A quarterly summary of the information to document compliance with Condition D.4.1 D.3.2 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## Section D.5 has been renumbered as Section D.4

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The correct statements in the TSD would be as follows (additions indicated in **boldface**, deletions indicated by strikeout for emphasis):

Compliance Monitoring requirement "1." is shown as corrected in Response 2 above, the remaining Compliance Monitoring requirements are shown corrected as follows:

- 2. Storage tanks EU Tank 3, EU Tank 4, and EU Tank 5 have applicable compliance monitoring conditions as specified below:
  - a) The sum of the nominal throughputs capacity of distillates products through all three storage Tanks based on existing physical limitations is limited to 905,940,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. These limits are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each tank per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.
  - Records of the types of volatile petroleum liquid stored (gasoline and distillates) and records to demonstrate the value of OE in the screening equation, the maximum true vapor pressure of the liquid as stored, and the results of inspections performed on the storage vessels shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limit on the total tank throughput for these storage tanks is needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

- 3. The operation of the tank truck loading rack has applicable compliance monitoring conditions as specified below:
  - The **nominal** loading **capacity** of petroleum products (gasoline and distillates) through the a) truck loading rack is limited to 123,262,000 gallons of gasoline and 473,040,000 gallons of distillates per twelve (12) consecutive month period, rolled on a monthly basis. The loading of gasoline through the truck loading rack is limited to 123,262,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis. These limits are The gasoline parameter is necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).
  - b) Quarterly reports shall be submitted to the OAM. These reports shall include the gallons of throughput for each petroleum product (gasoline and distillates) per month. The reports shall also include deviations from compliance monitoring criteria, certification that corrective actions were taken, or certification that no deviations occurred during the reporting period.

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana

Permit Reviewer: RAM/EVP

Page 11 of 14 T181-7040-00008

c) Records of the types of volatile petroleum liquid loaded (gasoline and distillates) and records to demonstrate the value of OE in the screening equation, the maximum true vapor pressure of the liquid as loaded, and the results of inspections performed on the vapor collection and control system shall be maintained for a minimum of 36 months and made available upon request of the OAM.

These monitoring conditions are necessary because the limits on the tank truck loading rack are needed to ensure compliance with 326 IAC 20, (40 CFR Part 63.420, Subpart R).

The following page has been added to the permit following Section D.4.

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana

Permit Reviewer: RAM/EVP

## PART 70 OPERATING PERMIT Lafayette Terminal Screening Equation Parameters

Source Name: Amoco Oil Company - Lafayette Marketing Terminal 11555 South Indiana 43, Brookston, Indiana 47923

Mailing Address: P.O. Box 236, Brookston, Indiana 47923

Part 70 Permit No.: T181-7040-00008

These parameters are those that were current at the time of permit issue. If facility receives approval on a new parameter values, then the facility shall comply with the most recently approved parameter values. The facility is required to maintain a copy of the current parameter values on site.

Changes to parameter values are allowed without a permit modification if such changes do not result in changes to the physical lay out of the facility (e.g., construction of new tanks or physical modification of the loading rack) or increase the VOC potential to emit for the facility.

The terminal handles non-reformulated and non-oxygenated gasoline: CF = 0.16

Sources of OE emissions include distillate and interface management at tanks and racks, remediation, barge loading of gasoline, and other minor miscellaneous sources.

Under 40 CFR 63 Subpart R, the facility is required to not exceed any of the following parameters on a 30 day rolling basis.

#### **Number of Gasoline Storage Tanks and components**

Fixed Roof (TF)	Internal Floating Roof (TI)	External Floating Roof (Primary seals only) (TE)	External Floating Roof (Primary and secondary seals) (TES)	Total Fugitive Components (C)
0	3	0	0	1000

#### **Screening Equation**

ET = CF\*(0.59\*TF(1-CE) + 0.038\*TI + 0.17\*TE + 0.08\*TES + 8.5\*10-6\*C + 4.52\*10-6\*Q) + 0.04\*0E

Maximum gasoline loading rack throughput allowed on a 30 day rolling basis:

123.26 MM gallons per year

or 337,704 gallons per day or 1,278,208 liters per day

With these parameter values, and a maximum value of OE of 1.25 tons per year of HAPS from non-gasoline management sources (i.e., distillate management), the facility value of Et will be less than 1.0.

Current Screening Equation Parameter Limit

Pages 42, 43 and 45 of 46 of the draft permit has been replaced by the following page which is now page 41 of 42. Page 44 of 46 of the draft permit which is the quarterly reporting form on Tank 7 has been removed.

IN	IDIANA DEP		OF ENVIRON OF AIR MANA ANCE DATA	AGEMENT	ANAGEMEN	IT		
	PA	RT 70 OPERA	TING PERMIT	Quarterly Repo	ort			
Source Name: Source Addres Mailing Addres Part 70 Permit Facility: Parameter: Limit:	Address: 11555 South Indiana 43, Brookston, Indiana 47923 Address: P.O. Box 236, Brookston, Indiana 47923 Permit No.: T181-7040-00008 Three Petroleum Products (Gasoline) Storage Tanks, Three Distillates Storage Tanks and Petroleum Products Loading							
Genera	ator S/V ID: _		Month:		Year:			
		Maximum Pa	ramotor Value	- Only in Gas	olino Sorvico			
Month	No. of Fixed Roof Tanks		No. of Ext. Floating Roof Tanks	No. of Ext. Floating Roof Tanks (Primary and Secondary Seals)	No. of Fugitive	Rack Gasoline Throughput for Month (Gallons per Day)		

9	No deviation occurred in this quarter.					
9	Deviation/s occurred in this quarter. Deviation has been reported on:					
Submit Title / F Signatu Date: Phone:	Position:					

Amoco Oil Company - Lafayette Marketing Terminal Brookston, Indiana Permit Reviewer: RAM/EVP

#### Comment #4

The applicant has requested OAM to "Please note that the TSD, in reflecting the permit, erroneously states that throughput limits on the storage tanks 'are necessary in order to ensure compliance with 326 IAC 20, (40 CFR Part 63, Subpart R)." The applicant also stated that: "The TSD also contains an error, stating a loading rack limitation of 80 million gallons of gasoline per year throughput on page 7. Clearly, the throughput parameter established in the Lafayette Terminal screening equation submittal is much greater than the 80 million gallons per year number mentioned in the TSD. We understand that changes to the TSD are not made but are referenced in the TSD Addendum."

#### Response #4

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The correct statements in the TSD would be as follows (additions indicated in **boldface**, deletions indicated by strikeout for emphasis):

It should be noted that these revisions do not increase emissions above the potentials listed in the TSD. They are needed to reflect that no limits are needed on VOC emissions and that only HAP emissions are limited pursuant to 326 IAC 20, (40 CFR Part 63.420, Subpart R).

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The loading rack has a limitation of 80,000,000 screening equation parameter for gasoline loading of 126,262,000 gallons of gasoline per year with an average Reid Vapor Pressure (RVP) of 10 pounds per square inch (psi). The screening equation parameters are necessary to meet the definition of an area source as part of (to limit any single HAP to less than 10 tons per year and any combination of HAPs to less than 25 tons per year) as a result of 40 CFR 63 Subpart R.

		Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	СО	NO <sub>x</sub>	Single HAP	Total HAPs	
Truck Loading Gasoline	-		-	561.15 2153.1		-	_	_	
Truck Loading Distillates				3.88 3.9			-	_	
Storage Tanks				10.5 10.8		_	-	_	
Fugitives	_	1.71		0.16 0.2			_	_	
Insignificant	1		1	5		-	_	_	
Total Emissions	-	1.71	-	<del>580.69</del> 2173.0	_		<10*	<25*	

<sup>\*</sup> Pursuant to 326 IAC 20, (40 CFR Part 63.420, Subpart R), a source that has documented through the submission of the screening equation showing a value of ET<1, that it is not a major source for HAPs as defined at Section 63.2 of this part has a potential to emit of any single HAP below 10 tons per year and the total PTE of all HAPs are below 25 tons per year.

## Appendix A: Emission Calculations Source Wide Summary

Company Name: Amoco Oil Company - Lafayette Terminal Address City IN Zip: 11555 South Indiana 43, Brookston, Indiana 47923

FESOP: T181-7040-00008

Reviewer: Richard A. Moore Jr./EVP

Date: 10/19/98

Total VOC Emissions (Tons/yr)  ncontrolled) 2157.09	Total VOC Emissions (Tons/yr)  (Uncontrolled)  565.03	Total VOC Emissions (Tons/yr) (Uncontrolled)
(Tons/yr) ncontrolled)	(Tons/yr) (Uncontrolled)	(Tons/yr) (Uncontrolled)
ncontrolled)	(Uncontrolled)	(Uncontrolled)
,		
2157.09	565.03	114.22
10.5	10.5	6.22
5	5	5
0.16	0.16	0.16
2172.75	580.69	125.6
	5 0.16	5 5 0.16 0.16

## Appendix A: Emission Calculations Tank Emissions Maximum PTE

Company Name: Amoco Oil Company - Lafayette Terminal
Address City IN Zip: 11555 South Indiana 43, Brookston, Indiana 47923
FESOP: T181-7040-00008

Reviewer: Richard A. Moore Jr./EVP

Date: 10/19/98

Tank	Product	Losses (Pounds per Year) Standing   Working   Withdraw   Rim Seal   Deck Fitting Deck Seam   Total						Tons/yr	
Number	Stored	Standing	Working	Withdraw	Rim Seal	Deck Fitting	Deck Seam	Total	Total
001	Petroleum Products			943	2739.53	573.99		4256.52	2.13
002	Petroleum Products				2739.53	573.99		3313.52	1.66
003	Distillate	105.32	3937.38					4042.7	2.02
004	Distillate	132.54						132.54	0.07
005	Distillate	181.51						181.51	0.09
006	Petroleum Products				4109.3	2984.86		7094.16	3.55
007	Petroleum Products	1508.72	446.8					1955.52	0.98
Grand Total		1928.09	4384.18	943	9588.36	4132.84	0	20976.47	10.5

Note: All storage tank emissions estimated using EPA's TANKS 3.0 software program.

## **Appendix A: Emission Calculations Fugitive Equipment Leak Emissions**

Company Name: Amoco Oil Company - Lafayette Terminal
Address City IN Zip: 11555 South Indiana 43, Brookston, Indiana 47923
FESOP: T181-7040-00008

Reviewer: Richard A. Moore Jr./EVP

Date: 10/19/98

Component Type & Service	Source Component Count	x	NOTE (1) Emission Factor (kg/Hr/Comp)	x 9.656 ton- hr/kg-yi	Estimated Total VOC Emissions (Tons/yr)
Connectors - Vapor	0		4E-05		0
Connectors - Lt Liguid	634		8E-06		0.049
Valves - Vapor	0		1.3E-05		0
Valves - Lt Liquid	65		4.3E-05		0.027
Valves - Hvy Liquid	47		4.3E-05		0.02
Pump Seals Lt. Liquid	4		5.4E-04		0.021
Pump Seals Lt. Liquid Pump Seals Hvy Liquid	3		5.4E-04		0.016
Other - Lt. Liquid	24		1.3E-04		0.03
Total					0.163

Note (1) Emission Estimates" pub. EPA 453/R-95-017, Nov. 95 Table 2-3.

Page 3 of 5

## **Emissions from Truck Loading Operations**

Company Name: Amoco Oil Company - Lafayette Terminal 11555 South Indiana 43, Brookston, Indiana 47923 T181-7040-00008

Reviewer: Richard A. Moore Jr./EVP

Date: 10/19/98

<b>Uncontrolled Emis</b>	Uncontrolled Emissions with Average RVP = 13, Worst Case PTE									
		C	D	E	F	AP-42	Loading			
Material Loaded	Throughput	Saturation	MW	Temperature	TVP	Emission	Losses			
	kgal	Factor (S)	lb/lb-mole	F	psi	Factor	(tons/yr)			
						12.46xC x D x F/(E +460)	BxG/2000			
Petroleum Products (Gasoline)	473,040	1.0	62	53.68	6.0534	9.1037	2,153.21			
Distillates	473,040	1.0	130	53.68	0.0052	0.0164	3.88			
Total							2,157.09			

Note: Emission factor in pounds per thousand gallons loaded, based on AP-42, 5th Ed, 1995.

## **Emissions from Truck Loading Operations**

Company Name: Amoco Oil Company - Lafayette Terminal 11555 South Indiana 43, Brookston, Indiana 47923 T181-7040-00008

Reviewer: Richard A. Moore Jr./EVP

Date: 10/19/98

Uncontrolled Emissions with Average RVP = 13, Limited Throughput G									
Material Loaded	Throughput kgal	C Saturation Factor (S)	D MW lb/lb-mole	E Temperature F	F TVP psi	AP-42 Emission Factor 12.46xC x D x F/(E +460)	Loading Losses (tons/yr) BxG/2000		
Petroleum Products (Gasoline)	123,280	1.0	62	53.68	6.0534	9.1037	561.15		
Distillates	473,040	1.0	130	53.68	0.0052	0.0164	3.88		
Total							565.03		

Note: Emission factor in pounds per thousand gallons loaded, based on AP-42, 5th Ed, 1995.